

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

GREG TARPLEY,

Defendant.

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) No. 4:16 CR 41 ERW/JMB
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MOTION TO CONTINUE FILING OF PRETRIAL MOTIONS

Comes now Defendant Greg Tarpley, through his attorney, Assistant Federal Public Defender Michelle Monahan, and moves the Court to continue the date to file pretrial motions. In support of this request Counsel submits the following:

1. Counsel received initial discovery. Counsel is still investigating the forensic evidence in the case. Counsel is not in a position to intelligently advise Defendant whether or not he should file motions and what those motions may be.
2. Counsel will be out of the office and unavailable to the Defendant the week of from March 2, 2016 to March 9, 2016.
3. The subject matter of this charge calls for the consultation with an expert for pretrial motions. Counsel requests additional time to determine if an expert may be necessary for pretrial motions.
4. Defendant Tarpley has multiple matters which significantly impact the pending federal case. Counsel requests additional time to communicate with authorities and the Defendant to explain the ramifications of these cases.
5. Counsel is currently in negotiations with the Government and would benefit from an extension of the pretrial motion filing date.

6. Counsel is acting as expeditiously as possible, however, the continuance is requested in the interest of justice allowing a reasonable amount of time for counsel to be properly and effectively prepared pursuant to 18 U.S.C. Section 3161.

WHEREFORE, Counsel requests a continuance of the filing of pretrial motions. Counsel respects the orders and time of the Court. If the Court is inclined to grant said request, Counsel asks for a continuance of four weeks.

Respectfully submitted,

/s/ Michelle L. Monahan
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Gilbert Sison, Assistant United States Attorney.

/s/ Michelle L. Monahan
MICHELLE L. MONAHAN
Assistant Public Defender